

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	Chapter 7
<b>Mack Industries, Ltd., et al.,</b>  Debtors.	Bankruptcy No. 17-09308 (Jointly Administered)  Honorable Carol A. Doyle
<b>Ronald R. Peterson</b> , as chapter 7 trustee for Mack Industries Ltd.,  Plaintiff,  v.  <b>Illinois Department of Revenue,</b>  Defendant.	Adversary No. 19-00564

**NOTICE OF MOTION**

**Please take notice** that on **Thursday, February 18, 2021, at 10:45 A.M.**, or as soon thereafter as counsel may be heard, the undersigned attorneys shall appear before the Honorable Carol A. Doyle United States Bankruptcy Judge for the Northern District of Illinois, or any other judge sitting in her place and stead, and shall then and there present the **Uncontested Motion to Extend Briefing Schedule**, a copy of which is attached hereto and herewith served upon you.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 161 155 8289 and the password is Doyle742. The meeting ID and password can also be found on the judge's page on the court's web site.

Dated: January 21, 2021

**Ronald R. Peterson**, as chapter 7  
trustee for Mack Industries, Ltd.,

By: /s/ Jeffrey K. Paulsen  
One of His Attorneys

Jeffrey K. Paulsen (6300528)

Ariane Holtschlag (6294327)

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### **CERTIFICATE OF SERVICE**

I, Jeffrey K. Paulsen, an attorney, hereby certify that on January 21, 2021, pursuant to Section II.B.4 of the Administrative Procedures for the Case Management/Electronic Case Filing System and Fed.R.Civ.P. 5(a), I caused a copy of the foregoing *Notice of Motion* and the accompanying *Motion* to be served electronically through the Court's Electronic Notice for Registrants on all persons identified as Registrants on the Service List below.

/s/ Jeffrey K. Paulsen

### **SERVICE LIST**

#### **Registrants in the Case** (Service via ECF)

<b>Ariane Holtschlag</b>	aholtschlag@wfactorlaw.com; bharlow@wfactorlaw.com; gsullivan@ecf.inforuptcy.com; holtschlagar43923@notify.bestcase.com
<b>Robert Lynch</b>	robert.lynch2@illinois.gov, bobjlynchecf@gmail.com
<b>Jeffrey K. Paulsen</b>	jpaulsen@wfactorlaw.com; bharlow@wfactorlaw.com; jpaulsen@ecf.inforuptcy.com

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In re:	Chapter 7
<b>Mack Industries, Ltd., et al.,</b>	Bankruptcy No. 17-09308
Debtors.	(Jointly Administered)
	Honorable Carol A. Doyle
<b>Ronald R. Peterson</b> , as chapter 7 trustee for Mack Industries Ltd.,	
Plaintiff,	
v.	Adversary No. 19-00564
<b>Illinois Department of Revenue,</b>	
Defendant.	

**UNCONTESTED MOTION TO EXTEND BRIEFING SCHEDULE**

Ronald R. Peterson, as chapter 7 trustee for Mack Industries, Ltd. (the “**Plaintiff**”), by and through his attorneys, by agreement with counsel for the Illinois Department of Revenue (the “**Defendant**”), moves this Honorable Court to extend the schedule for briefing the Defendant’s Motion to Dismiss (the “**Motion**”).

**BACKGROUND**

At presentment of the defendant’s Motion to Dismiss, this Court set a briefing schedule on the motion. The Trustee was to file his response by January 21, the defendant, its reply by February 18. A status was also set on March 18. The Trustee has been working on his response but needs an additional two weeks to complete it. The defendant has agreed to the extension, provided they get an equivalent extension of their reply deadline.

## DISCUSSION

“When an act is required ... to be done at or within a specified period ..., the court for cause shown may at any time in its discretion ... order the period enlarged if the request therefore is made before the expiration of the period originally prescribed ....” Fed. R. Bankr. P. 9006(b)(1).

Cause exists here to extend the Trustee’s response deadline. The Trustee is working to complete his response to the defendant’s motion but needs an additional two weeks to complete it. The defendant has agreed to this extension. The Trustee therefore requests that the deadline for his response be extended to February 4, 2021, and that the defendant’s reply deadline is likewise extended to March 4, 2021.

**Wherefore**, the Trustee respectfully requests that the Court extend the time for him to file his response to the motion to dismiss to February 4, 2021, the deadline for the defendant to file its reply to March 4, 2021, and grant such further relief as is appropriate in the circumstances.

Dated: January 21, 2021

**Ronald R. Peterson**, as chapter 7 trustee for Mack Industries, Ltd.

By: /s/ Jeffrey K. Paulsen  
One of His Attorneys

Jeffrey K. Paulsen (6300528)  
Ariane Holtschlag (6294327)  
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